

United States District Court

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DISTRICT OF

IOWA

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UNITED STATES OF AMERICA

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

V.

CRIMINAL COMPLAINT

KEITH LUKE RANDOLPH,

CASE NUMBER: 4:012-MJ-137

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

During the period beginning on or about April 13, 2012, and continuing to on or about July 2, 2012, in the Southern District of Iowa, the defendant, KEITH LUKE RANDOLPH, did use a facility of interstate and foreign commerce, to knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in sexual activities for which a person could be charged with a criminal offense.

This is a violation of Title 18, United States Code, Section 2422(b).

I further state that I am an Inspector with the United States Postal Inspection Service and that this Complaint is based on the following facts:

See Affidavit attached and incorporated hereto.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


USPIS L.M. Jensen


Sworn to before me and subscribed in my presence,

July 5, 2012
Date

at

Des Moines, Iowa
City and State

United States Magistrate Judge


Ross A. Walters

AFFIDAVIT

I, Linda Jensen, Postal Inspector, U.S. Postal Inspection Service, after being duly sworn to oath, do depose and state as follows:

1. I am a duly authorized Postal Inspector of the U.S. Postal Inspection Service at Des Moines, Iowa. I have been a Postal Inspector for 16 years. I am currently involved in an assignment that includes investigation of prohibited mail investigations (i.e., mail bombs, child pornography, etc.). I have personally investigated the use of the U.S. Mails and other facilities of interstate and foreign commerce to send and receive pornographic and obscene materials involving sexual exploitation of children and the coercion/enticement of children as proscribed in Title 18, United States Code, 1461, 1470, 2422B, 2251, 2252 and 2252A. I have executed or participated in multiple search warrants where child pornography and/or controlled dangerous substances were sent through the U.S. Mails. I have also received training from the U.S. Postal Inspection Service, as well as other local, state and federal entities, into conducting investigations pertaining to the possession and trafficking of child pornography via the U.S. Mail and computers.

2. This affidavit is made in support of an arrest warrant for KEITH LUKE RANDOLPH for violations of Title 18, United States Code, Section 2422(b).

3. The information contained within this affidavit is based on my personal observations or training and, where noted, information related to me by other Postal

Inspectors and law enforcement officers and/or agents. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence of violations of Title 18, United States Code, Section 2422(b).

NATURE OF VIOLATION

4. On April 13, 2012, an individual using an online screen name of "keith9187" posted a message in a chat room titled "jailbait" on a website known as "motherless.com". The "motherless.com" website is described as a "moral free zone" site and contains videos and images of graphic sexual content. There are multiple chat rooms on the "motherless.com" website, including chat rooms titled "jailbait", "incest", "bestiality", "gay" and "red light district." The online message from "keith9187" inquired as to whether there were any females from Iowa online. Also on April 13, 2012, a response was made to this posting by an undercover account controlled by law enforcement (LE). During the initial online chat conversation, the following exchanges took place:

- Undercover LE, posing as 14 year old female, responded to post with "r u really from ia????"
- "keith9187" replies to the undercover "yes".
- Undercover LE, posing as 14 year old female responded "me 2" and a few replies later is asked by "keith9187" "male or female?"

- Undercover LE, posing as 14 year old female, responded “female 14 (meaning 14 years of age)” then “u?”
- “keith9187” replies to the undercover “31 m (meaning 31 years of age and male)”
- “keith9187” goes on to state to Undercover LE that “I hope you don’t mind that I like younger girls”

5. Beginning April 13, 2012 through the present “Keith9187” and also using Yahoo screen name “dragonmaster9187” and email address “Keith9187@gmail.com” engaged in conversations online with undercover LE. Some of the conversations included below again mentions the age of the undercover LE:

- During a conversation, the undercover LE, in talking online about stuff you can’t do at the age of 14 years of age tells “Keith9187” “that is another thing u cant do at 14” when talking about tattoos that “Keith9187” currently has.
- On April 14, 2012 “Keith9187” was sent a picture image of an age regressed female LE officer then provided the explanation that stated this is a pic taken “last day 8th grade last year” when 13 years old after a conversation about being in middle school currently.
- On May 16, 2012 undercover LE sent a message online to “Keith9187” that stated “14 sucks sooo bad wish I cud drive” to which “Keith9187” responded “it’s ok.”

6. During the online conversations from April 13, 2012 through the present an individual using a screen name of "Keith9187" engaged in online conversations with an LE undercover account. The following exchanges take place over a period of time and multiple sexually related remarks are made, including:

- "Keith9187" asked undercover LE "have you ever had a guy go down on you?" then followed up with "has a gone (guy) ever done oral sex on you?"
- "Keith9187" ask the LE undercover "may I ask what size bra you wear"
- "Keith9187" ask the LE undercover "doy (do) you shave or trim?" while talking about swimsuits.
- "Keith9187" states online to LE undercover "When we meet will you wear only the panties and no bra"
- "Keith9187" states online to LE undercover after suggesting that they go swimming together then to movie "Well I was going to kiss you and touch you while we swim and play with you during the movie"
- "Keith9187" states online to LE undercover when asked what he will bring when they meet "condoms and my swim trunks"
- "Keith9187" states online to LE undercover that while their in his car he would "like maybe lightly rub your pussy a lil bit"
- "Keith9187" states online to LE undercover in a conversation about getting a hotel room "I can teach you a few positions and can show you how good it feels to have someone lick your pussy"

7. Beginning April 13, 2012 through the present "Keith9187" and also using Yahoo screen name "dragonmaster9187" and email address "Keith9187@gmail.com" engaged in conversations online with undercover LE. During the online conversation, the following exchange takes place over a period of time that led law enforcement to and individual residing in Ogden, IA (Boone County):

- (April 13, 2012) "Keith9187" provided that "im about 45 mins from des moines"
- (April 13, 2012) "Keith9187" provides that "I live in boone I have daughter that will be 6 in june" describes himself as "31 m."
- (April 13, 2012) "Keith9187" states online to LE undercover "well I go to dmacc studying cooking" referring to Des Moines Area Community College.
- (April 13, 2012) "Keith9187" is asked by LE undercover "do you have yahoo??" and "Keith9187" responds with "dragonmaster9187".
- (May 3, 2012) "Keith9187" sent an email to LE undercover using keith9187@gmail.com email address.
- (June 12, 2012) "Keith9187" provides online to LE undercover his phone number as "515 835 9538".
- (July 2, 2012) "Keith9187" states online to LE undercover that the color of his car is "black".

8. On June 26, 2012, Postal Inspector LM Jensen picked up a package at the Johnston, IA post office which was mailed to LE undercover P.O. Box in Johnston, IA. The LE undercover P.O. Box address was previously provided to "Keith9187" while online. The mail piece was addressed to the LE undercover name and address with a return address of "Keith R., 601 W Maple, Ogden IA 50212". The package was opened by your affiant and it contained four (4) thong panties, all size small, two black in color, one red/black and one multicolored. Also contained in the mail piece was a handwritten note on a small white piece of paper which read "wear these when we meet and let me know when you get them I want to meet the 1st week of July is that ok?"

OTHER INVESTIGATIVE DATA

10. Your affiant reviewed USPS records and verified with the mail carrier that the address provided on the State of Iowa Drivers License for Keith Luke Randolph is 601 W. Maple St, Ogden, IA 50212 is a known name recognized for that address by the regular mail carrier for that delivery point.

11. The affiant examined the Iowa Department of Transportation records for an Iowa driver's license issued to Keith Luke Randolph. The records reflect that an Iowa driver's license was issued to Keith Luke Randolph on November 16, 2007 and it is not due to expire until November 12, 2012. The number on that driver's license matched the social security number issued to Keith Luke Randolph. These records further provide Mr. Randolph's personal descriptors as OLN: 101BB9296, DOB: 11-XX-1980, HGT: 5'11", WGT: 180 lbs, EYES: Brown. Mr. Randolph's residential address is listed on his driver's license is 601 W. Maple St, Ogden, IA 50212.

12. On May 14, 2012, the affiant searched Accurint LE, an online public records database available to law enforcement. The records show Keith Luke Randolph currently residing at 601 W. Maple St, Ogden, IA 50212.

13. Also on May, 14, 2012, the affiant searched another data base available to law enforcement for phone numbers available with Accurint LE. A search of the phone number 515 835 9538 provided by "Keith9187" to LE undercover during online exchanges was conducted. The data base records indicated that the phone is assigned to a Verizon Wireless customer in Iowa.

14. On July 5, 2012 the affiant conducted surveillance 601 W. Maple St, Ogden, IA 50212 and saw a car parked in driveway. The license plate on the vehicle was an Iowa plate 378XGR. The license plate was called in to the Postal Inspection Service National Law Enforcement Communication Center (NLECC) for verification. NLECC advised that the license is assigned to a Black, 2001, Mercury Sable four door car with a registered owner listed as Keith Luke Randolph.

15. On May 14, 2012, the affiant searched "Keith9187" using Google (web) and found numerous results. Included in the find was a website called "motherless.com" where "Keith9187" posted on the site "? do you like incest? ?" and joined the website on March 20, 2012. The posting further included that "Keith9187" was "male", "straight" "favorite porn-incest", "location-iowa" and "Im looking for women close to me who like

incest, porn, strip clubs, and swinin. Im 31 5'11" with short dark hair, brown eyes, earring, 3 tattoos, if you're interested send me a message".

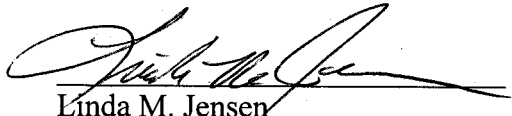
16. On July 2, 2012, the undercover LE engaged in online messaging with "Keith9187". During the course of this online exchange, "Keith9187" asked the undercover LE "do you think we can meet soon" and LE responded "YES!!!!!! "when??" "Keith9187" then responded "maybe Friday" indicating this Friday, July 6, 2012. "Keith9187" further asked LE undercover "where would you like to meet" and the undercover LE agreed to meet on Friday, July 6, 2012 at 11:00 a.m. This meeting is to take place at the Casey's General Store located on Merle Hey Road in Johnston, IA.

17. On July 3, 2012, the affiant reviewed a police incident report filed at the Boone Iowa Police Department in April 2012 where Keith Luke Randolph was a suspect. Boone Iowa Police responded to a possible sex crime at 214 Monona St, Boone, IA 50036 after a nine year old female indicated Keith Luke Randolph inappropriately touched her. The investigation is ongoing with the Boone Police Department. Christina Leighton, the mother of the nine year old female, indicated that Keith Luke Randolph moved out in April 2012 and is living with his parents at 601 W Maple St, Ogden, IA 50212.


18. Based upon the above, I believe there is probable cause to arrest Keith Luke Randolph, for violations of Title 18 United States Code Sections 2422B.

19. WHEREFORE, your affiant respectfully requests that a warrant be issued authorizing the United States Postal Inspection Service officers to arrest Keith Luke Randolph.

Dated: July 5, 2012


Linda M. Jensen
U.S. Postal Inspector

Subscribed to and sworn before me this 5th day of July 2012.


U.S. Magistrate Judge